

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

REBECCA PEAK,	)	
	)	
Plaintiff,	)	Case No. 08 C 784
	)	
v.	)	Judge Lefkow
	)	
AUNT MARTHA’S YOUTH	)	Magistrate Judge Denlow
SERVICE CENTER,	)	
	)	Jury Trial Demanded
Defendant.	)	

**PLAINTIFFS’ UNOPPOSED MOTION  
FOR LEAVE TO FILE AMENDED COMPLAINT**

Plaintiff, Rebecca Peak, by her attorneys, Pedersen & Weinstein LLP, and pursuant to Rule 15(a)(2) of the Federal Rules of Civil Procedure, respectfully requests leave to file the attached Amended Complaint against Defendant, Aunt Martha’s Youth Service Center, and states the following in support thereof:

1. Plaintiff filed her Complaint against Defendant on February 6, 2008.
2. Plaintiff’s claims against Defendant include claims under the Civil Rights Act of 1964, 42 U.S.C. Section 2000e et seq., as amended by the Civil Rights Act of 1991 (“Title VII”).
3. In her Complaint, Plaintiff stated that she had requested and received her Notice of Right to Sue on her initial charge of discrimination filed with the Equal Employment Opportunity Commission (“EEOC”), but that she had not yet requested the Notices of Right to Sue on two subsequent charges she filed. (Complaint, ¶ 42). However, Plaintiff included all factual allegations in her Complaint in order to set forth fully her claims against Defendant, including those under 42 U.S.C. Section 1981, which do not require exhaustion of administrative remedies. (Id.)

4. Since filing her Complaint, Plaintiff requested the Notices of Right to Sue on her two subsequent charges, which the EEOC issued on or about May 12, 2008.

5. Plaintiff now seeks to file an Amended Complaint to reflect the fact that she has received the Notice of Right to Sue on all her charges and has exhausted fully the administrative process for her claims under Title VII. A copy of Plaintiff's Amended Complaint is attached as Exhibit A.

6. Plaintiff's Amended Complaint does not set forth any new or revised factual allegations. Allowing Plaintiff to file an Amended Complaint will not alter the discovery schedule already set in place.

7. Plaintiff's counsel contacted Defendant's counsel to see if it would oppose this motion. Defendant does not oppose Plaintiff's motion.

8. Defendant will not be prejudiced by the amendment of the Complaint as this case is in its incipency and no new factual allegations are at issue.

**WHEREFORE**, Plaintiff respectfully requests that her motion for leave to file the attached Amended Complaint be granted.

Respectfully submitted,

/s/ Erika Pedersen

Erika Pedersen  
Jill Weinstein  
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**CERTIFICATE OF SERVICE**

I hereby certify that on May 30, 2008, a copy of the foregoing *Plaintiff's Unopposed Motion For Leave To File Amended Complaint* was filed electronically. I further certify that on May 30, 2008, I caused a true and correct copy of the attached *Plaintiff's Unopposed Motion For Leave To File Amended Complaint* to be served via electronic and U.S. mail upon the following:

Berry K. Tucker, Esq.  
Cheri L. Costa, Esq.  
Berry K. Tucker & Associates, Ltd.  
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/s/Erika Pedersen  
Erika Pedersen

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